



Organic Farmers' Agency for Relationship Marketing

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To: Chief, Standardization Branch, Livestock and Seed Program,
AMS, USDA,
Room 2603-S, Stop 0254, 1400 Independence Avenue, SW,
Washington, DC 20250-0254.

E-mail: marketingclaim@usda.gov

Subject: Request for comments on Docket Number LS-02-02 concerning Meat
Marketing Claims

The Organic Farmers' Agency for Relationship Marketing (OFARM), thanks you for the opportunity to comment on Docket Number LS-02-02 concerning Meat Marketing Claims.

OFARM, is a marketing-agency-in-common. OFARM's member organizations represent hundreds of organic field crop and livestock producers across the United States and Canada. Our members sell grain into both the U.S. and international markets both for food products and livestock feed. Our interest in this issue is based on the fact that many livestock producers purchase organic grains for feed and our some of our members also produce organic livestock.

We are urge USDA to withdraw the proposed meat marketing labeling standards and undertake a more extensive and inclusive process for writing such labeling claims with substantial input from family farm, consumer, humane, and environmental organizations.

After careful review of the proposed standards, we are concerned that these claims could undermine the integrity of the labels they seek to define, mislead consumers, and have a devastating affect on small and mid-sized farmers who are pioneers of these marketing claims.

Specifically we urge the Agricultural Marketing Service of USDA to:

- 1) Withdraw proposed meat marketing claims and standards and start over again. We would like to see efforts of USDA to consult closely with family farm, consumer, humane, and environmental organizations before issuing a final proposal.
- 2) Our farmer members have major concerns about labeling and preserving the integrity of grass-fed, free-range, and antibiotic free meat and want proposed USDA claims to meet farmer and consumer expectations. Products should accurately be represented by clear labeling. As presently proposed by USDA, the labels would not do this.
- 3) As an organization representing farmers, we do not want to see the same problems that resulted from the recent organic livestock feed exemption clause recently enacted that casts doubt on the integrity of accurate organic labels. Standards for the labels you are proposing need to ensure consumer confidence and provide producers with an important value-added market because of labeling integrity.

Sincerely,
John A. Bobbe
John Bobbe, OFARM Executive Director